

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DR. JUDY WOOD on behalf §  
of the UNITED STATES OF AMERICA §

Plaintiff,

VS.

APPLIED RESEARCH ASSOCIATES, \$  
INC.; SCIENCE APPLICATIONS \$  
INTERNATIONAL CORP.; \$  
BOEING, NuSTATS; COMPUTER \$  
AIDED ENGINEERING ASSOCIATES, \$  
INC.; DATASOURCE, INC.; \$  
GEOSTAATS, INC.; GILSANZ \$  
MURRAY STEFICEK LLP; HUGHES \$  
ASSOCIATES, INC.; AJMAL ABBASI; \$  
EDUARDO KAUSEL; DAVID PARKS; \$  
DAVID SHARP; DANIELE VENEZANO; \$  
JOSEF VAN DYCK; KASPAR WILLIAM; \$  
ROLF JENSEN & ASSOCIATES, INC.; \$  
ROSENWASSER/GROSSMAN \$  
CONSULTING ENGINEERS, P.C.; \$  
SIMPSON GUMPERTZ & HEGER, INC.; \$  
S. K. GHOSH ASSOCIATES, INC.; \$  
SKIDMORE, OWINGS & MERRILL, \$  
LLP; TENG & ASSOCIATES, INC.; \$  
UNDERWRITERS LABORATORIES, \$  
INC.; WISS, JANNEY, ELSTNER \$  
ASSOCIATES, INC.; AMERICAN \$  
AIRLINES; SILVERSTEIN PROPERTIES; \$  
and UNITED AIRLINES, \$

Defendants.

Case No. 07CV3314 (GBD)

**AFFIDAVIT OF WM. DAVID BYASSEE  
IN SUPPORT OF APPLIED RESEARCH  
ASSOCIATES, INC.'S MOTION FOR  
SANCTIONS PURSUANT TO FED. R. CIV.  
P.11 AND § 3730(d)(4) OF THE FCA**

Wm. David Byassee, being duly sworn, hereby deposes and says as follows:

1. I am a member of Jackson Kelly PLLC, attorneys of record for Defendant Applied Research Associates, Inc. in the captioned case.
2. I am admitted *pro hac vice* in this matter.
3. I submit this Affidavit in Support of Applied Research Associates, Inc.'s Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 and § 3730(d)(4) of the FCA, solely to submit certain

